

PUBLICLY FILED VERSION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiffs,

- against -

BANK OF NEW YORK, JP MORGAN
CHASE, SOCIETE GENERALE, and
CITIBANK,

Defendants.

THE BANK OF NEW YORK MELLON,
JPMORGAN CHASE BANK, N.A.,
SOCIETE GENERALE and CITIBANK, N.A.,

Third-Party Plaintiffs,

- against -

STEVEN M. GREENBAUM (sued individually
and as administrator of the estate of JUDITH
GREENBAUM), *et al.*,

Third-Party Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/10/14

Case No. 09 Civ. 5900 (RPP)(MHD)

STIPULATION AND ORDER

FILED UNDER SEAL

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel
for plaintiffs and third-party defendants Jeremy and Dr. Lucille Levin, Estate of Michael Heiser,
and the Greenbaum and Acosta judgment creditors (together, the "Judgment Creditors"), and
defendant Citibank, N.A. ("Citibank") as follows:

WHEREAS, certain judgment creditors of Iran have served Citibank with restraining
orders and/or writs with respect to assets of The Republic of Iran or its agents or
instrumentalities held by Citibank:

WHEREAS, Citibank has blocked certain wire transfers ("Blocked Assets") pursuant to Executive Orders issued by the President of the United States and regulations issued by the United States Department of the Treasury, Office of Foreign Assets Control ("OFAC");

WHEREAS, OFAC has granted licenses for certain of the Blocked Assets as set forth in the attached Schedule A (the "Licenses"), authorizing Citibank to release the proceeds of those Blocked Assets in accordance with the instructions contained therein;

WHEREAS, the Judgment Creditors agree that they do not assert, and will not assert, any claim to the Blocked Assets which are the subject of the Licenses and that all restraint, attachment and/or claim of any kind (whether legal or equitable) with respect to the those Blocked Assets only is henceforth null and void;

NOW, THEREFORE, absent a timely objection filed with the Court from any other party to this proceeding within five (5) days following the date of this Order, Citibank shall transfer the funds in accordance with and pursuant to the Licenses.


Dated: New York, New York
May 14, 2014

DLA PIPER LLP (US)

By: _____
Dale K. Cathell, Esq.
Richard Kremen, Esq.

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6225 Smith Avenue
Baltimore, Maryland 21209-3600
Tel: (410) 580-4122
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*Attorneys for Plaintiffs
Estate of Michael Heiser, et al.*

DAVIS WRIGHT TREMAINE LLP

By:  _____
Sharon L. Schneier, Esq.
Christopher J. Robinson, Esq.

1633 Broadway 27th floor
New York, New York 10019
Tel: (212) 489-8230
Attorneys for Defendant Citibank N.A.

WHEREAS, Citibank has blocked certain wire transfers ("Blocked Assets") pursuant to Executive Orders issued by the President of the United States and regulations issued by the United States Department of the Treasury, Office of Foreign Assets Control ("OFAC");

WHEREAS, OFAC has granted licenses for certain of the Blocked Assets as set forth in the attached Schedule A (the "Licenses"), authorizing Citibank to release the proceeds of those Blocked Assets in accordance with the instructions contained therein;

WHEREAS, the Judgment Creditors agree that they do not assert, and will not assert, any claim to the Blocked Assets which are the subject of the Licenses and that all restraint, attachment and/or claim of any kind (whether legal or equitable) with respect to the those Blocked Assets only is henceforth null and void;

NOW, THEREFORE, absent a timely objection filed with the Court from any other party to this proceeding within five (5) days following the date of this Order, Citibank shall transfer the funds in accordance with and pursuant to the Licenses.

Dated: New York, New York
May __, 2014

DLA PIPER LLP (US)

By: [Signature]

Dale K. Cathell, Esq.
Richard Kremen, Esq.

The Marbury Building
6225 Smith Avenue
Baltimore, Maryland 21209-3600
Tel: (410) 580-4122
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Fax: (212) 489-8340
*Attorneys for Plaintiffs
Estate of Michael Heiser et al*

DAVIS WRIGHT TREMAINE LLP

By: [Signature]

Sharon L. Schneier, Esq.
Christopher J. Robinson, Esq.

1633 Broadway 27th floor
New York, New York 10019
Tel: (212) 489-8230
Attorneys for Defendant Citibank N.A.

HOWARTH & SMITH

By: 

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523 West Sixth Street, Suite 728

Los Angeles, CA 90014

Tel: (213) 955-9400

Fax: (213) 622-0791

Attorneys for Plaintiffs

Jeremy Levin and Lucille Levin

STROOCK & STROOCK & LAVAN LLP

By: _____

Curt Mechling, Esq.

Ben Weathers-Lowin, Esq.

180 Maiden Lane

New York, New York 10038

Tel: 212-806-5614

Fax: 212-806-2614

Attorneys for Plaintiffs

The Greenbaum and Acosta Judgment Creditors

SO ORDERED



Hon. Robert P. Patterson, U.S.D.J.

RM

June 9, 2014

HOWARTH & SMITH

By: _____

Suzelle Smith, Esq.
523 West Sixth Street, Suite 728
Los Angeles, CA 90014
Tel: (213) 955-9400
Fax: (213) 622-0791
Attorneys for Plaintiffs
Jeremy Levin and Lucille Levin

STROOCK & STROOCK & LAVAN LLP

By: _____

Curt Mechling, Esq.
Ben Weathers-Lowin, Esq.
180 Maiden Lane
New York, New York 10038
Tel: 212-806-5614
Fax: 212-806-2614
Attorneys for Plaintiffs
The Greenbaum and Acosta Judgment Creditors

SO ORDERED

Hon. Robert P. Patterson, U.S.D.J.

SCHEDULE A



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2013-300631-1

Citibank
201 S. Biscayne Boulevard
Suite 600
Miami, FL 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	Citibank NA Manama
Value Date:	11/06/2012
Amount:	\$181,301.70
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank N.A Manama blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank N.A Manama is authorized to return the funds to the originator or originating financial institution.

Sincerely,

3/24/2014

Jeanette Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc:

REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2013-300752-1

Citibank, N.A.
201 S. Biscayne Boulevard
Suite 600
Miami, FL 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	12/05/2012
Amount:	\$2,145.35
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank, N.A. blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank, N.A. is authorized to return the funds to the originator or originating financial institution.

Sincerely,

04/10/2014

Jeanette Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc: REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. IA-2013-303862-1

Citibank, N.A.
201 S. Biscayne Boulevard
Suite 600
Miami, Florida 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	05/17/2013
Amount:	\$488,462.56
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank, N.A. blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank, N.A. is authorized to return the funds to the originator or originating financial institution.

Section 560.555 of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (the "ITSR") states that permitted activities designed to wind down existing contracts entered into by parties now subject to 560.215 provided that such transactions were completed by March 8, 2013. Because this transaction took place after March 8, 2013 the beneficiary requires a specific license to receive funds. The beneficiary may submit an application for a specific license under 560.555 through our online system at www.treasury.gov/resource-center/sanctions/Pages/licensing.aspx. If the beneficiary is unable to use the online system, a new application may be submitted by mail to the Office of Foreign Assets Control's Licensing Division.

Sincerely,

3/24/2014

Jeanette A. Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc: REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2013-303864-1

Citibank, N.A.
201 S. Biscayne Boulevard
Suite 600
Miami, Florida 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	05/29/2013
Amount:	\$646,808.91
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank, N.A. blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank, N.A. is authorized to return the funds to the originator or originating financial institution.

Section 560.555 of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (the "ITSR") states that permitted activities designed to wind down existing contracts entered into by parties now subject to 560.215 provided that such transactions were completed by March 8, 2013. Because this transaction took place after March 8, 2013 the beneficiary requires a specific license to receive funds. The beneficiary may submit an application for a specific license under 560.555 through our online system at www.treasury.gov/resource-center/sanctions/Pages/licensing.aspx. If the beneficiary is unable to use the online system, a new application may be submitted by mail to the Office of Foreign Assets Control's Licensing Division.

Sincerely,

3/24/2014

Jeannette A. Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc:

REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2013-303865-1

Citibank, N.A.
201 S. Biscayne Boulevard
Suite 600
Miami, Florida 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	06/14/2013
Amount:	\$345,739.84
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank, N.A. blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank, N.A. is authorized to return the funds to the originator or originating financial institution.

Section 560.555 of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560 (the "ITSR") states that permitted activities designed to wind down existing contracts entered into by parties now subject to 560.215 provided that such transactions were completed by March 8, 2013. Because this transaction took place after March 8, 2013 the beneficiary requires a specific license to receive funds. The beneficiary may submit an application for a specific license under 560.555 through our online system at www.treasury.gov/resource-center/sanctions/Pages/licensing.aspx. If the beneficiary is unable to use the online system, a new application may be submitted by mail to the Office of Foreign Assets Control's Licensing Division.

Sincerely,

3/24/2014

Jeanette A. Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc:

REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2013-306320-1

Citibank, N.A.
201 S. Biscayne Boulevard
Suite 600
Miami, FL 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	11/30/2012
Amount:	\$100.00
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank, N.A. blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank, N.A. is authorized to return the funds to the originator or originating financial institution.

Sincerely,

04/22/2014

Jeanette Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc: REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2014-308454-1

Citibank
201 S. Biscayne Boulevard
Suite 600
Miami, FL 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	12/30/2013
Amount:	\$80.00
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank is authorized to return the funds to the originator or originating financial institution.

Sincerely,

04/18/2014

Jeanette Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc: REDACTED



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

License No. 1A-2014-308935-1

Citibank
201 S. Biscayne Boulevard
Suite 600
Miami, FL 33131

Attn: Francisco Rapp

Reference is made to the following blocked funds transfer:

Originator:	REDACTED
Originating Bank:	
Value Date:	08/23/2012
Amount:	\$10,727.76
Beneficiary Bank:	REDACTED
Beneficiary:	

Citibank blocked this transfer pursuant to U.S. sanctions administered by the Office of Foreign Assets Control ("OFAC"). OFAC has carefully reviewed the information presented and otherwise available to it in connection with this transfer and has determined that Citibank is authorized to return the funds to the originator or originating financial institution.

Sincerely,

04/22/2014

Jeanette Jaeggi
Chief, Licensing Division
Office of Foreign Assets Control

Date

cc: REDACTED